

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1**

**FAEGRE DRINKER BIDDLE & REATH LLP**

Michael P. Pompeo  
600 Campus Drive  
Florham Park, NJ 07932  
Tel: (973) 549-7000  
Fax: (973) 360-9831  
[michael.pompeo@faegredrinker.com](mailto:michael.pompeo@faegredrinker.com)

and

James H. Millar (*pro hac vice* pending)  
1177 Avenue of the Americas, 41<sup>st</sup> Fl.  
New York, NY 10035  
Tel: (212) 248-3264  
Fax: (212) 248-3141  
[james.millar@faegredrinker.com](mailto:james.millar@faegredrinker.com)

*Counsel for the Ad Hoc Group of  
Holders of Crown Capital Notes*

In re:

CBRM REALTY INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-15343 (MBK)

(Joint Administration Requested)

**VERIFIED STATEMENT PURSUANT  
TO BANKRUPTCY RULE 2019**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: CBRM Realty Inc. (2420), Crown Capital Holdings LLC (1411), Kelly Hamilton Apts LLC (1115), Kelly Hamilton Apts MM LLC (0765), RH Chenault Creek LLC (8987), RH Copper Creek LLC (0874), RH Lakewind East LLC (6963), RH Windrun LLC (0122), RH New Orleans Holdings LLC (7528), and RH New Orleans Holdings MM LLC (1951). The location of the Debtors' service address in these chapter 11 cases is: 4499 Pond Hill Road, San Antonio Texas 78231.

In connection with the chapter 11 case (the “Chapter 11 Case”) commenced by the above-captioned debtors and debtors in possession (the “Debtors”), on May 19, 2025, pursuant to rule 2019 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rule 2019”), Faegre Drinker Biddle & Reath LLP (“Faegre Drinker” or “Counsel”) hereby submit this verified statement (the “Verified Statement”), with respect to Counsel’s representation of the ad hoc group identified herein (the “Ad Hoc Group of Holders of Crown Capital Notes”) formed by certain unaffiliated beneficial holders of the Debtors’ senior unsecured notes: (a) 8.00% Senior Unsecured Notes due 2025, (b) 12.50% Social Senior Unsecured Notes due 2025, and (c) 6.75% Senior Unsecured Notes due 2027 (“Notes”).

1. Beginning on or about March 25, 2024, the Ad Hoc Group of Holders of Crown Capital Notes retained Faegre Drinker to represent them in connection with a potential restructuring of the Debtor’s obligations.

2. The Ad Hoc Group of Holders of Crown Capital Notes holds disclosable economic interests or acts as investment managers or advisors to funds and/or accounts that hold disclosable economic interest in relation to certain of the Debtors. In accordance with Bankruptcy Rule 2019 and based upon information provided to Counsel by each of the Ad Hoc Group of Holders of Crown Capital Notes <sup>2</sup>, attached hereto as Exhibit A is a list of the names addresses, nature, and amount of all disclosable economic interests of each of the members of the Ad Hoc Group of Holders of Crown Capital Notes in relation to the Debtors. The information set forth herein (including Exhibit A) is based upon information provided to

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<sup>2</sup> No member of the Ad Hoc Group of Holders of Crown Capital Notes assumes any fiduciary or other duties to any other member or to any other entity or individual.

Faegre Drinker by the members of the Ad Hoc Group of Holders of Crown Capital Notes and is intended only to comply with Bankruptcy Rule 2019.

3. As of the date of this Verified Statement, Counsel represents only the Ad Hoc Group of Holders of Crown Capital Notes and does not represent or purport to represent any entity or entities other than the Ad Hoc Group of Holders of Crown Capital Notes in connection with the Debtors' Chapter 11 Case.

4. Nothing contained in this Verified Statement (or the Exhibit hereto) should be construed as (a) a limitation upon, or waive of, any rights of the Ad Hoc Group of Holders of Crown Capital Notes to assert, file, and/or amend any claim or proof of claim filed in accordance with applicable law and any orders entered in these Chapter 11 Case or (b) an admission with respect to any fact or legal theory.

5. Counsel reserves the right to amend this Verified Statement as necessary in accordance with the requirements set forth in Bankruptcy Rule 2019.

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Dated: May 23, 2025

**FAEGRE DRINKER BIDDLE & REATH LLP**

/s/ Michael P. Pompeo

Michael P. Pompeo (NJ Bar No. 03032-1996)  
600 Campus Drive  
Florham Park, NJ 07932  
Telephone: (973) 549-7000  
Facsimile: (973) 360-9831  
michael.pompeo@faegredrinker.com

James H. Millar (*pro hac vice* pending)  
1177 Avenue of the Americas, 41st Floor  
New York, NY 10036  
Telephone: (212) 248-3264  
Facsimile: (212) 248-3141  
james.millar@faegredrinker.com

*Counsel for the Ad Hoc Group of  
Holders of Crown Capital Notes*

**CERTIFICATE OF SERVICE**

I, Michael P. Pompeo, hereby certify that on May 23, 2025, I caused the foregoing *Verified Statement Pursuant to Bankruptcy Rule 2019* to be served by this Court's CM/ECF System.

/s/ Michael P. Pompeo  
Michael P. Pompeo

**EXHIBIT A**

<u>NAME<sup>1</sup></u>	<u>ADDRESS</u>	<u>NATURE AND AMOUNT OF DISCLOSABLE ECONOMIC INTERESTS<sup>2</sup></u>
Edward S. Stein	8468 Abbington Circle, #2122, Naples, FL 34108	12.5% 2025 Notes: \$300,000
Jacques de Saint Phalle	13647 Deering Bay Drive Coral Gables, FL, 33158	12.5% 2025 Notes: \$1,000,000
First Dakota National Bank	225 Cedar St., Yankton, SD 57078	12.5% 2025 Notes: \$1,000,000 6.75% 2027 Notes: \$2,000,000
Adams Bank & Trust	315 North Spruce, Box 720, Ogallala, NE 69153	6.75% 2027 Notes: \$7,000,000 8% 2025 Notes: \$3,000,000 12.5% 2025 Notes: \$2,000,000
LL Mortgage Fund, L.P.	2400 Market Street, Suite 302, Philadelphia, PA 19103	12.5% 2025 Notes: \$2,000,000 6.75% 2027 Notes: \$2,750,000
The Ohio State Life Insurance Company	300 Crescent Court, Suite 700, Dallas, TX 75201	12.5% 2025 Notes: \$2,000,000
Citizens State Bank	32500 Woodward Avenue, Royal Oak, MI 48073	12.5% 2025 Notes: \$1,000,000 6.75% 2027 Notes: \$1,500,000
Cattaraugus County Bank	120 Main Street, Little Valley, NY 14755	6.75% 2027 Notes: \$500,000 8% 2025 Notes: \$1,000,000
Catholic Holy Family Society <sup>3</sup>	2021 Mascoutah Ave. (physical), Belleville, IL 62220 PO Box 327 Belleville, IL 62222	6.75% 2027 Notes: \$500,000
First Catholic Slovak Union	6611 Rockside Road, Suite 300, Independence, OH 44131	6.75% 2027 Notes: \$2,000,000
Luso-American Financial, A Fraternal Benefit	7080 Donlon Way, Suite 200 (NPA reads "Donion") Dublin, CA 94568	6.75% 2027 Notes: \$500,000
National Slovak Society of the USA	1301 Ashwood Drive, Canonsburg, PA 15317 <sup>4</sup>	6.75% 2027 Notes: \$5,000,000

<sup>1</sup> The members of the Ad Hoc Group of Holders of Crown Capital Notes are listed here either (i) as entities that hold disclosable economic interests directly or (ii) on behalf of certain of their affiliates or affiliated investment funds or investment funds, accounts, vehicles, or other entities that hold disclosable economic interests that are advised, sub-advised, or managed by the members of the Ad Hoc Group of Holders of Crown Capital Notes.

<sup>2</sup> To the best of Faegre Drinker's knowledge, the information included herein is accurate as of the date hereof. The debt amounts set forth herein include only outstanding principal amounts and do not include accrued or unpaid interest or other amounts that may be owing under the applicable debt documents.

<sup>3</sup> Currently known as "Catholic Fraternal Life".

<sup>4</sup> Former address: 351 Valley Brook Road, McMurray, PA 15317-3337.

<u>NAME</u> <sup>1</sup>	<u>ADDRESS</u>	<u>NATURE AND AMOUNT OF DISCLOSABLE ECONOMIC INTERESTS</u> <sup>2</sup>
Polish Roman Catholic Union of America	984 N. Milwaukee, Chicago, IL 60642	6.75% 2027 Notes: \$1,000,000
SPJST	520 North Main Street, Temple, TX 76503	6.75% 2027 Notes: \$1,000,000
Ukrainian National Association	2200 Route 10, PO Box 280, Suite 201, Parsippany, NJ 07054-0780	6.75% 2027 Notes: \$1,000,000
Western Catholic Union	510 Maine St, Quincy, IL 62301	6.75% 2027 Notes: \$1,000,000
Gulf Coast Bank & Trust	200 St Charles Avenue, 3 <sup>rd</sup> floor, New Orleans, La 70130	6.75% 2027 Notes: \$2,000,000
Bar Harbor Bank and Trust	82 Main Street PO Box 400 Bar Harbor, ME 04609	6.75% 2027 Notes: \$8,000,000 12.5% 2025 Notes: \$1,000,000
Strada Philanthropy, Inc.	10 W Market Street, Suite 1100, Indianapolis, IN, 46204, USA	6.75% 2027 Notes: \$1,500,000
AmeriServ Financial Bank	216 Franklin Street, Johnstown, PA 15901	6.75% 2027 Notes: \$1,000,000
Royal Bridge Master Fund LP	c/o Royal Bridge Capital LP 110 Somerville Ave, Suite 266, Chattanooga, TN 37405	12.5% 2025 Notes: \$250,000
Concert Insurance Company	21805 Field Parkway, Suite 320, Deer Park, IL 60010	12.5% 2025 Notes: \$200,000
Concert Specialty Insurance Company	21805 Field Parkway, Suite 320, Deer Park, IL 60010	12.5% 2025 Notes: \$200,000
Concert Group Holding, Inc.	21805 Field Parkway, Suite 320, Deer Park, IL 60010	12.5% 2025 Notes: \$200,000
Evergreen National Indemnity Company	6150 Oak Tree Blvd., Suite 440, Independence, Ohio 44131	12.5% 2025 Notes: \$300,000
Gramercy Risk Management, LLC	333 Earle Ovington Blvd., Suite 502, Uniondale, NY 11553	12.5% 2025 Notes: \$100,000
Stillwater Insurance Company	6800 Southpoint Pkwy., Suite 700, Jacksonville, FL 32216	12.5% 2025 Notes: \$1,500,000
Stillwater Property and Casualty Insurance Company	6800 Southpoint Pkwy., Suite 700, Jacksonville, FL 32216	12.5% 2025 Notes: \$500,000

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First Missouri Bancshares, Inc.	P.O. Box 190, Brookfield, MO 64628	12.5% 2025 Notes: \$500,000
ProAssurance Indemnity Company, Inc.	100 Brookwood Place, Birmingham, AL 35209	12.5% 2025 Notes: \$750,000
Norcal Insurance Company	100 Brookwood Place, Birmingham, AL 35209	6.75% 2027 Notes: \$1,250,000 8% 2025 Notes: \$1,000,000 12.5% 2025 Notes: \$750,000
Customers Bank	40 General Warren Blvd Suite 200, Malvern, PA 19355	6.75% 2027 Notes: \$17,500,000 8% 2025 Notes: \$4,000,000 12.5% 2025 Notes: \$20,000,000
Hood Family Trust	900 Crestview Lane, Owatonna, MN 55060	12.5% 2025 Notes: \$75,000
Thompson Bond Fund	PO Box 46520 Madison, WI 53744-6520	12.5% 2025 Notes: \$7,000,000
CFBank, N.A.	4960 E. Dublin-Granville Road, Suite 400, Columbus, Ohio 43081	8% 2025 Notes: \$3,000,000 12.5% 2025 Notes: \$4,000,000
Cincinnati Insurance Company	6200 South Gilmore Road, Fairfield, Ohio 45014	6.75% 2027 Notes: \$11,000,000 8% 2025 Notes: \$4,000,000 12.5% 2025 Notes: \$5,000,000
Cincinnati Life Insurance Company	6200 South Gilmore Road, Fairfield, Ohio 45014	6.75% 2027 Notes: \$4,000,000 8% 2025 Notes: \$3,000,000 12.5% 2025 Notes: \$2,000,000
National Security Insurance Company	331 E Davis St Elba, AL 36323	12.5% 2025 Notes: \$500,000
NexBank	2515 McKinney Ave, Suite 1100, Dallas, TX 75201	12.5% 2025 Notes: \$5,000,000
Great American Insurance Company	301 E. Fourth St. – 38 <sup>th</sup> Floor, Cincinnati, OH 45202, Attn: Matthew Hill	8% 2025 Notes: \$2,500,000
Federated Life Insurance Company	121 East Park Square, Owatonna, MN 55060	6.75% 2027 Notes: \$7,000,000 8% 2025 Notes: \$4,000,000 12.5% 2025 Notes: \$3,000,000
Federated Mutual Insurance Company	121 East Park Square, Owatonna, MN 55060	6.75% 2027 Notes: \$7,000,000 8% 2025 Notes: \$4,000,000 12.5% 2025 Notes: \$5,000,000
Federated Reserve Insurance Company	121 East Park Square, Owatonna, MN 55060	12.5% 2025 Notes: \$500,000

<u>NAME<sup>1</sup></u>	<u>ADDRESS</u>	<u>NATURE AND AMOUNT OF DISCLOSABLE ECONOMIC INTERESTS<sup>2</sup></u>
Federated Service Insurance Company	121 East Park Square, Owatonna, MN 55060	12.5% 2025 Notes: \$1,000,000
Granite Re Inc.	121 East Park Square, Owatonna, MN 55060	12.5% 2025 Notes: \$500,000
Sagicor Reinsurance Bermuda	Suite 301, Canon's Court   22 Victoria Street, Hamilton   HM 12 Bermuda	6.75% 2027 Notes: \$14,000,000
		8% 2025 Notes: \$1,500,000
Andrew D. Baker	142 Long Lots Road, New Canaan, CT 06840	12.5% 2025 Notes: \$50,000
John Beckelman	1251 Avenue of the Americas, 6th Fl., New York, NY 10020	12.5% 2025 Notes: \$1,000,000